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7 Attorneys for Defendant
8 The United States of America

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 SAYED EMRAN,

13 Plaintiff,

14 v.

15 UNITED STATES OF AMERICA,

16 Defendant.
17
18
19

) CASE NO. 3:15-CV-4023 EDL
)
)

) **JOINT REQUEST FOR A CASE**
) **MANAGEMENT CONFERENCE; [PROPOSED]**
) **ORDER SETTING A CASE MANAGEMENT**
) **CONFERENCE**

20 Pursuant to Local Rule 7-11, defendant United States of America and plaintiff Sayed Emran, jointly
21 request that the Court set a case management conference.

22 An initial case management conference was held on June 14, 2016. At that time, motions to dismiss
23 filed by defendant United States and by other co-defendants who have been dismissed from this action
24 were pending before the Court. Given that the parties anticipated the possibility of more than one round
25 of motions to dismiss, the parties did not propose case management dates at that time, and instead,
26 requested permission to propose dates after the pleadings were settled. See ECF No. 36 at ¶ 17. At the
27 June 14, 2016 case management conference, the Court set deadlines for the exchange of initial
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1 disclosures and amendment of the pleadings, and referred the matter for mediation through the Court's
2 ADR department. *See* ECF No. 38. No further case management deadlines were set.

3 The Court addressed several rounds of motions related to plaintiff's complaint, first amended
4 complaint, and second amended complaint. On January 6, 2017, the Court issued an order denying in
5 part and granting in part defendant United States' motion to dismiss certain claims in the second
6 amended complaint. *See* ECF No. 74. Defendant United States has answered the second amended
7 complaint.

8 On February 22, 2017, the parties conducted mediation through the Court's ADR program. The
9 parties completed their mediation efforts without resolution.

10 The parties respectfully request the scheduling of a case management conference so that the parties
11 may discuss with the Court a proposed discovery plan, and the setting of deadlines for discovery and
12 dispositive motions in this action. No further case management conferences have been held in this
13 matter since the pleadings were finalized. No discovery cut-offs, or other deadlines, have been set.

14 For the above stated reasons, the parties request that the Court set a case management conference so
15 that a case management order can be issued. The parties propose that the Court set a case management
16 conference for November 14, 2017, and that the parties submit their joint case management statement,
17 including proposed schedules for the case, by November 7, 2017.

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19 Dated: October 20, 2017

Respectfully submitted,

20 BRIAN J. STRETCH
21 United States Attorney

22 /s/
23 JENNIFER S WANG
Assistant United States Attorney

24 Dated: October 20, 2017


25
26 /s/
27 WILLIAM E. KING
Attorney for Plaintiff Sayed Emran

~~[PROPOSED]~~ ORDER

The Court hereby sets a case management conference for November 14, 2017 at 10:00 a.m. A joint case management statement must be filed by November 7, 2017.

IT IS SO ORDERED.

DATED: October 23, 2017


ELIZABETH D. LAPORTE
United States Magistrate Judge